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August 27, 1999

Via Hand Delivery

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th St., S.W., Room TW-B204
Washington, D.C. 20554

Re: Ex Parte File Nos. 48-SAT-P/LA-97, 89-SAT-AMEND-97, 130-SAT-AMEND-98, RM No. 9147

Dear Ms. Salas:

On August 26, 1999, Mark MacGann, Helene Fauve, Christine Mengelle and Guy Christiansen, of SkyBridge L.P., Jeffrey Krauss of Telecommunications Technology Policy, and Jeffrey Olson of Paul, Weiss, Rifkind, Wharton & Garrison met in person with the members of the staffs of the Office of Engineering and Technology, the Wireless Telecommunications Bureau, and the International Bureau identified in Attachment A hereto, for the purpose of discussing issues relating to the above-referenced matters. At this meeting, copies of Attachment B hereto were distributed.

Please contact the undersigned if you have any questions.

Respectfully submitted,

Jeffrey H. Olson
Attorney for SkyBridge L.P.

Enclosures

cc: Persons listed in Attachment A

Doc#: DC1: 95013.1

ATTACHMENT A

FCC MEETING ATTENDEES

Name	Office
Shellie Blakeney	WTB
Julie Buchanan	IB
Thomas Derenge	OET
Julie Garcia	IB
Jennifer Gilsenan	IB
John Giusti	IB
Charles Iseman	OET
Julius Knapp	OET
Geraldine Matise	OET
Harry Ng	IB
Bruno Pattan	OET
Thomas Stanley	WTB
Scot Stone	WTB
Thomas Tycz	IB

Doc#: DC1: 95015.1

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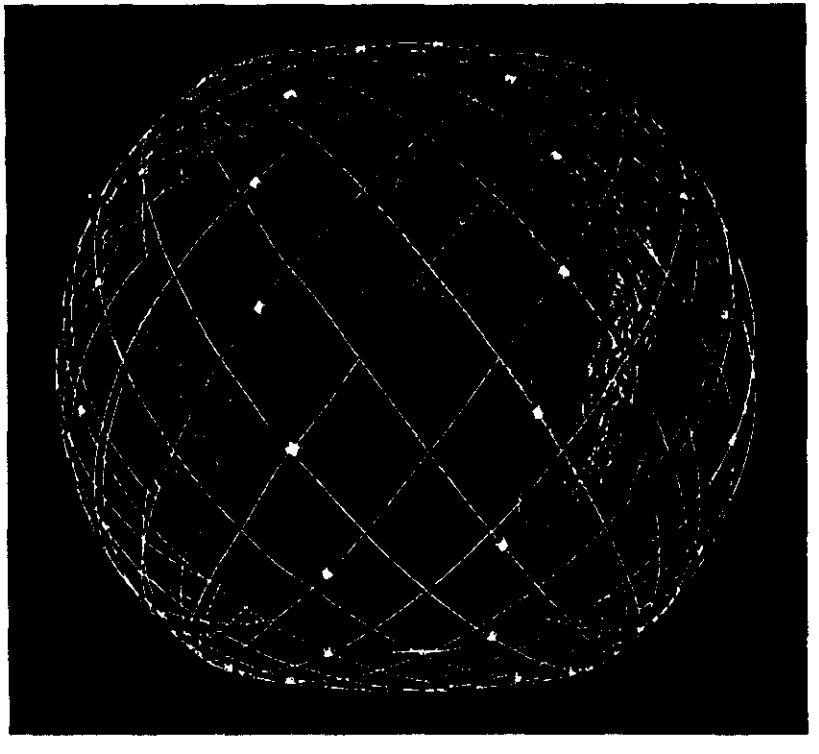

SkyBridge, LP

ATTACHMENT B

SkyBridge
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Summary of SkyBridge proposals

SkyBridge proposed rules

- Use of the band 10.7-11.7 GHz by NGSO FSS gateways only
- Clear gateway definition instead of limitation of gateway antenna diameter and/or number
- Use of classical coordination procedures
- Acceptance of gateway site shielding installation
- No restriction on gateway siting

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Use of the band 10.7-11.7 GHz by gateways only

Advantages of such a proposal from the FS standpoint

- guarantees the future development of FS systems in the band (no ubiquitous deployment of user terminals)
- facilitates coordination
- constitutes a precedent in the FS / FSS sharing

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Use of the band 10.7-11.7 GHz by gateways only

Impact of such a proposal on the SkyBridge design

- allows less flexibility in the SkyBridge frequency plan
- imposes important filtering constraints on the satellites due to the small guard band between :
  - ➔ the high power user terminal downlink band : 11.7-12.7 GHz
  - ➔ the gateway uplink band : 12.75-13.25 GHz

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Clear gateway definition

Proposed definition

"The gateway earth station complexes provide satellite radio frequency resources to NGSO FSS network user earth stations within each gateway coverage area, and thereby interconnect the user earth stations with other networks"

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Clear gateway definition

Advantages of such a definition

- based only on a functional description of a gateway
- prevents operation of user terminals in the band (in full support of previous proposal)
- as a consequence : no need for a minimum gateway antenna diameter or a maximum number of gateways

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Use of standard coordination procedures

Details of the proposal

- coordination of the gateways would be done using the standard coordination procedures already in force in the FCC Rules (47 CFR §25.251)
- the coordination area around each NGSO FSS gateway would be determined using the updated methodology developed by TG1/6 (revision of App28/S7 to be endorsed by WRC2000)

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Use of standard coordination procedures

Advantages of the proposal

- the new methodology for calculation of coordination areas around NGSO earth stations :
  - ➔ takes into account the time-varying nature of the NGSO antennas (more realistic method)
  - ➔ leads to smaller coordination distances than for GSO
  - ➔ as a consequence, will significantly lower the coordination burden, which benefits both the FSS operator and the FS operator

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Gateway site shielding

Proposal (1/2)

- in addition to the standard coordination procedure, SkyBridge proposes that NGSO FSS operators assume an obligation to accept shielding on gateway sites, in certain specified cases
- this is a precedent in the FS-FSS sharing
  - ➔ first time constraints are imposed on the affected service, at its site, even once coordination is completed

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Gateway site shielding

Proposal (2/2)

- in keeping with the principle of co-primary status : proposal to share the cost of shielding between the FS and the gateway operators
  - ➔ the cost of the shielding should be paid by the party requesting coordination
- if shielding is implemented around a NGSO FSS gateway, this should be taken into account in the coordination of new FS links for the detailed interference analysis, when appropriate
- in most cases, natural shielding will be sufficient

SkyBridge
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Gateway site shielding

Impact of such a proposal on the SkyBridge design

- leads to some constraints that need to be taken into account in the gateway design stage :
  - ➔ gateway site dimensions
  - ➔ suitability of terrain for future shielding
  - ➔ potential degradation of the signal (alteration of the antenna main beam, reflections ...)
  - ➔ environmental and aesthetic constraints